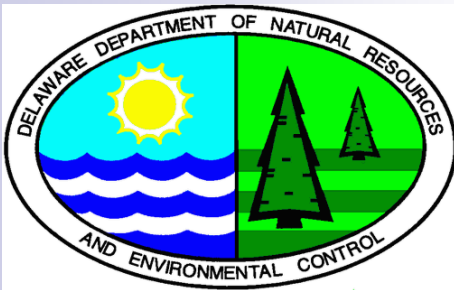




## 7 DE Admin Code 1138 Section 15

# *Motor Vehicle or Mobile Equipment Surface Coating Operations*



## EPA Region 3 / DNREC Collision Repair Training

January 12/13, 2010

*Blue Skies Delaware; Clean Air for Life*

# **Clean Air Act Amendments of 1990**

- **Congress identified 189 Hazardous Air Pollutants or HAPs**
- **Congress directed the EPA**
  - **To identify emission sources of those 189 HAPs and**
  - **To issue regulations to reduce HAPs emissions from those sources**



# Clean Air Act Amendments of 1990

- Congress directed the EPA to
  - Begin with those industrial facilities that typically have large HAPs emissions (major sources)
  - Only later, move on to those facilities that typically have smaller HAPs emissions (area sources)



# **Clean Air Act Amendments of 1990**

- **EPA activities on major sources**
  - **1992 - EPA published its initial listing of predominately major source categories**
  - **1993 – 2004 - EPA issued over 100 regulations addressing HAPs emissions from a wide variety of major sources, *including collision repair***
  - **2005 and on - EPA continues, but most resources have moved on to area sources**



# **Clean Air Act Amendments of 1990**

## **EPA's Area Source Air Toxics Program**

**As directed by Congress in 1990**



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# EPA's Area Source Air Toxics Program

- Congress required EPA to
  - Identify 30+ **HAPs** that present the greatest threat to public health
  - Identify types of sources that emit 90% of these 30+ **HAPs**
  - Issue regulations to reduce adverse health effects due to the emission of HAPs from these small facilities



# **EPA's Area Source Air Toxics Program**

- **EPA activities on area sources**
  - **1999 - EPA published its listing of 33 HAPs having the greatest health impact (in handouts)**
  - **1999 – 2002 - EPA identified 62 additional area source categories to be addressed (in handout for the 70 total categories)**
  - **2007 - EPA issued its first regulation for one of these additional 62 area sources**



# **EPA's Area Source Air Toxics Program**

- On January 9, 2008, EPA issued another area source standard
- Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
- 40 CFR Part 63 Subpart HHHHHH (Sub 6Hs)
- Federal adoptions of Area Source Standards lead to internal Departmental review



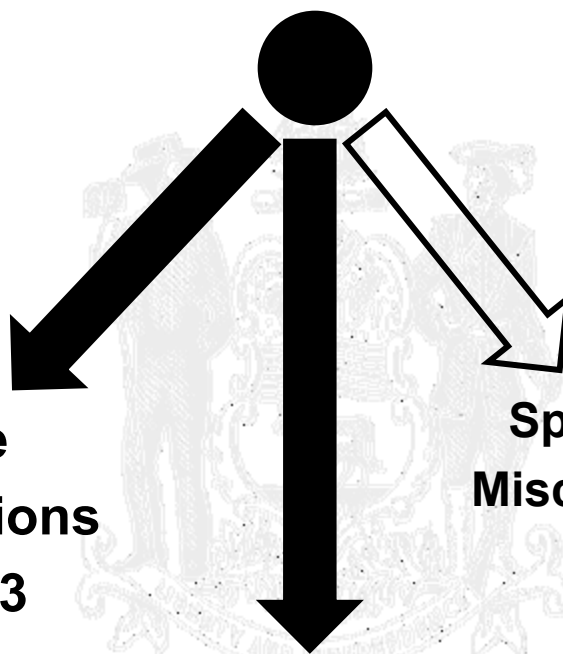


# Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

40 CFR Part 63 Subpart HHHHHH or Sub 6Hs



**Methylene Chloride  
Paint Stripping Operations  
Reg. 1138 Section 13**



**Spray Coating Operations for  
Miscellaneous Parts or Products  
Reg. 1138 Section 14**


**Spray Coating Operations for  
Motor Vehicles or Mobile Equipment  
Reg. 1138 Section 15**




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# I already have a Delaware Air Permit.

## So what is different??

 **State of Louisiana**  
Department of Environmental Quality

M.J. "MIKE" FOSTER, JR.  
GOVERNOR

 J. DALE GIVENS  
SECRETARY

Mr. Hank Hillard  
President  
Purgit Emission Control System  
2737 Buffalo Speedway  
Houston, TX 77098

Dear Mr. Hillard:

RE: Permit, Mobile Thermal Treatment System, Purgit Emission Control System, Houston, Texas

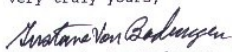
This is to inform you that the permit request for the above referenced facility has been approved under LAC 33:111.501. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operation begins. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed, properly operated, and maintained as specified in the application.



The permit number cited below should be referenced in future correspondence regarding this facility.

Done this 24<sup>th</sup> day of JAN., 1997.

Permit No.: 7777-00267-02

Very truly yours,  
  
Gustave A. Von Bodungen, P.E.  
Assistant Secretary

GVB:GNS:  
c: All Regional Offices

 OFFICE OF AIR QUALITY P.O. BOX 82135 BATON ROUGE, LOUISIANA 70864-2135  
AN EQUAL OPPORTUNITY EMPLOYER 

CONSTRUCTION PERMIT NO. 325-M-9  
FACILITY NAME: Rio Rancho Facility (AIRS No. 35-043-00005)

PERMITTEE: Intel Corporation  
Rio Rancho Facility  
4100 Sara Road (F9-605)  
Rio Rancho, NM 87124-1025  
Sandoval County

RESPONSIBLE COMPANY OFFICIAL: Mr. James Casciano

ISSUED BY: New Mexico Environment Department



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# **Collision Repair Requirements - Today**

- Delaware Air Regulation 1124 Section 11  
“Mobile Equipment Repair and Refinishing”
  1. Pollutant of interest: Volatile Organic Compounds (VOCs)
  2. Allowable Coating Application Technologies
    - HVLP spray or equivalent
    - Non-atomized applications
  3. No uncontrolled spray gun cleaning allowed
  4. Painters must be trained in the proper use and handling of coatings, solvents and waste





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# **Difference - 1**

- **Section 15** focuses on the coating solids in the overspray; not the volatile components
- **Section 15** focuses on 5 specific HAPs or “Target HAPs”
- “Target HAPs” are the compounds of
  - Cadmium
  - Chromium
  - Lead
  - Manganese
  - Nickel



See list of 33  
Area Source HAPs





## **Difference - 2**

- **Section 15** is applicable to “area HAP sources”

An **area source** of HAPs is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in aggregate, less than 10 tons per year of any HAP and less than 25 tons per year of any combination of HAPs.

- Also includes mobile repair and refinishing operations that travel to the customer





## **Difference - 3**

- **Section 15** is only applicable to surface coating operations that spray apply coatings



Minimizing and controlling overspray



## **Difference – 3 cont.**

For the purposes of **Section 15**, the following are not considered spray applied materials/activities

- Coatings applied from a hand-held device with a paint cup capacity that is  $\leq 3.0$  fluid ounces
- Thermal spray operations
- Powder coating application
- Use of hand-held, non-refillable aerosol containers
- Other non-atomizing application methods (i.e. brush, roller, dip, flow, etc)



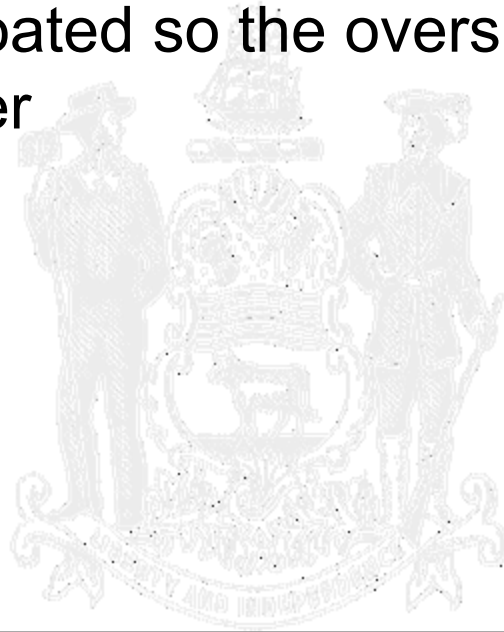
## **Difference 4**

- **Section 15** requires that
  - **All spray applications** be applied in a spray booth or other enclosure
  - **Enclosures** for assembled vehicles have a full roof and 4 complete walls
  - **Enclosures** for parts or sub-assemblies have a full roof and at least 3 complete walls
  - **Enclosures** be ventilated to draw air into the enclosure so the overspray is captured and directed to a filter



## **Difference 4 – cont.**

- **Section 15** requires that
  - **Mobile ventilated enclosures** be sealed against the surface being coated so the overspray is captured and directed to a filter



Minimizing and controlling overspray



## **Difference 5**

- **Section 15** requires
  - **Fitting all enclosures** with a filter technology certified by the manufacturer to achieve at least **98%** capture of the particulate entrained in the air



Minimizing and controlling overspray



# **Difference 6**

## ■ **Section 15** requires

- **Installing** a monitoring device and checking and recording the pressure drop across the installed filter technology at least once daily
- **Limiting spray application** to periods when the pressure drop across the filter is within manufacturer's recommended operating range



Minimizing and controlling overspray





# **Difference 7**

## ■ **Section 15 prohibits**

- **Spray application** by painters that are NOT certified (or recertified) as having completed the “acceptable” training program in the last five years



## **Difference 7 – cont.**

- **Section 15 requires**
  - The owner or operator must ensure and certify that all painters have successfully completed their training
  - Training can be conducted in-house, contracted, or a combination



Minimizing and controlling overspray



# **“Acceptable” Training Program**

- **Section 15** specifies the minimum acceptable content of the training program
  - Spray gun selection, its set up and operation
  - Spray technique for different types of coatings to improve transfer efficiency
  - Routine spray booth and filter maintenance
  - Filter selection and proper installation
  - Environmental compliance requirements

Minimizing and controlling overspray



# ***“Acceptable” Training Program – cont.***

- **Section 15’s “acceptable” training includes**

- **Hands-on** instruction and experience
- **Classroom** instruction
- **Demonstration** of learned knowledge and skill



- **Certification under Section 15** may not meet the Reg. 1124 Section 11 training requirements



# **Are there other differences?**

- **Of course, there are several other differences**

- **Two 1-time notifications**

- **An annual report requirement, IF your operation changes**

- **Recordkeeping**



- **These differences (with examples) and information highlighted today will be covered in detail during three DNREC February workshops**





# In Summary



***Blue Skies Delaware; Clean Air for Life***



# **Projected Section 15 Path Forward**

- **Conduct public workshops – February 16<sup>th</sup> (NCC), 18<sup>th</sup> (KC), and 25<sup>th</sup> (SC), 2010**
- Publish proposed regulation in Delaware Register of Regulation – May 1, 2010
- **Hold public hearing – June 10, 2010 (Dover)**
- Publish final regulation in Delaware Register of Regulation – September 1, 2010
- Regulation effective date – September 11, 2010

***Existing source compliance date is January 10, 2011***



## **For More Information on EPA's Sub 6Hs**

- Contact Cathleen Kennedy
  - (215) 814-2746
  - [kennedy.cathleen@epa.gov](mailto:kennedy.cathleen@epa.gov)

## **For More Information on Section 15**

- Contact Jim Snead
  - (302) 323-4542
  - [james.snead@state.de.us](mailto:james.snead@state.de.us)



For the latest information,  
follow the ongoing development of  
**Section 15 Regulatory Web Page**

**[www.awm.delaware.gov/Info/Regs/Pages/Section15.aspx](http://www.awm.delaware.gov/Info/Regs/Pages/Section15.aspx)**

